

# DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

5000 OVERLOOK AVENUE, S.W., WASHINGTON, D.C. 20032

December 19, 2005

Anthony Meadows
Acting Chief, Safe Drinking Water Act Branch
United States Environmental Protection Agency
Region III
1650 Arch Street
Mail Code: 3WP32
Philadelphia, PA 19103-2029

Re:

Administrative Order, Paragraph #83

Plan for Encouraging Full Service Line Replacements

Status Report

Dear Mr. Meadows:

In accordance with Administrative Order for Compliance on Consent (Docket No. SDWA-03-2004-0259DS), Paragraph 83, and DC WASA's plan submitted August 2, 2004 and approved by EPA, the following is a status report.

As stated in DC WASA's plan, we implemented the following:

- Partnering with Wachovia Bank to offer a low interest loan program for the customer portion of the lead service replacements to our income eligible customers;
- Partnering with the District's Department of Housing and Community Development (DHCD) on their grant program to offer up to \$5,000 to income eligible customers for replacing the private portion;
- Establishing a fixed fee for private side replacements equal to \$100 per linear foot for exterior water service line replacement and a flat fee of \$500 for inside work to the first threaded connection; and
- Incorporating information on these incentives to our customers through the Enhanced Public Education Plan.

For lead service replacements reported in Appendix A, and the Appendix A Addendum of the Annual Report for the 2005 Lead Service Replacement Program, the outcome of each incentive program as based on 1,218 full replacements is as follows:

- 0 customers responded that they intended to pay for the private side replacement, if lead, utilizing a loan from Wachovia Bank
- 0 loans were issued for lead service replacement
- 83 customers responded that they intended to pay for the private side replacement, if lead, utilizing a DHCD grant
- 63 DHCD grants were approved, 3 DHCD grants were denied, and the remaining applications are pending.
- 100% of private side replacements performed by WASA contractors were charged the fixed fee established by Board of Directors Resolution #04-61, effective July 9, 2004.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Sincerely,

John T. Dunn, P.E.

Deputy General Manager/Chief Engineer

## USEPA- DCWASA ADMINISTRATIVE ORDER Consent Docket No. SDWA-03-2004-0259DS Paragraph 83 Submittal Requirements

#### A. BACKGROUND

The District of Columbia Water and Sewer Authority's Board of Directors approved a resolution on May 6, 2004, which offered financing options for private lead service line replacements. The provisions of that resolution stated that the District of Columbia Water and Sewer Authority ("WASA") would collaborate with banking institutions to develop a program to offer below-market financing to qualified District homeowners, collaborate with Federal and District agencies to develop grant programs, and establish a simple rate structure for private lead service line replacements.

The resolution was subject to a formal ratemaking process because of the rate structure proposal, and the publication in the District of Columbia Municipal Register and public comment period were completed on June 27. On July 1, 2004, the Board gave its approval to the final resolution, and Resolution # 04-61 became effective upon final publication in the District of Columbia Municipal Register on July 9.

#### B. PROPOSED PLAN

Pursuant to the approval of this resolution, a summary of the programs that WASA has put into place follows.

- 1. Below-Market Financing WASA's primary banking institution, Wachovia, is offering a low interest loan program for the customer portion of lead service replacements to our income eligible customers. This program became available to customers on July 20 at any Wachovia branch bank located in the District of Columbia. This program has been coordinated between the Finance and Budget Office and the Office of Public Affairs.
- 2. .DHCD Grants The District's Department of Housing and Community Development (DHCD) has implemented their grant program to offer up to \$5,000 to income eligible customers for replacing the private portion of their lead service lines. In order to advise our Customer Assistance Program customers regarding the availability of the DHCD grants, WASA's Customer Service Department is contacting these customers, who were previously notified that the public portion of their lead service line would be replaced, but who declined to complete work on the private portion. Going forward, WASA will include DHCD's flyer in the package that is sent to each customer whose service line is scheduled for replacement.
- 3. Fixed Fee for Private Lead Water Service Line Replacements: Resolution # 04-61, effective on July 9, established a fixed fee of \$100 per linear foot for exterior water service line replacement, and a flat fee of \$500 for inside work to the first threaded connection. WASA began offering this rate to customers on July 19. WASA anticipates

this streamlined process will help increase the number of customers who have their service lines replaced.

- 4. These programs will be incorporated into the Enhanced Public Education Plan. As part of the outreach, WASA will provide residents accurate and timely information by:
  - Conducting press briefings
  - Developing and distributing information to local press
  - Expanding appearances on public affairs programs (radio/television)
  - Continuing to issue press releases and hold press conferences to ensure residents receive the latest information
  - Providing outreach to community and ethnic newspapers
  - Updating web sites
  - Sending direct communications to customers

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